

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

MDL No. 2804

This document relates to:

*The County of Summit, Ohio, et al. v. Purdue*

*Pharma L.P., et al.*

Case No. 18-op-45090

Hon. Dan Aaron Polster

*The County of Cuyahoga, et al. v. Purdue*

*Pharma L.P., et al.*

Case No. 17-op-45004

*City of Cleveland, Ohio, et al. v.*

*AmerisourceBergen Drug Corp., et al.*

Case No. 18-op-45132

**MOTION FOR LEAVE TO FILE**

**MEMORANDUM IN SUPPORT OF THE MANUFACTURER DEFENDANTS' JOINT  
MOTION TO DISMISS TRACK 1 PLAINTIFFS' CLAIMS FOR DAMAGES**

Defendants Cardinal Health, Inc. and McKesson Corporation (collectively, "Movants")

request leave to file a Memorandum in Support of the Manufacturer Defendants' Joint Motion To Dismiss Track 1 Plaintiffs' Claims for Damages, attached as Exhibit 1. Pursuant to CMO-1 § 6(g), Dkt. 232, the Court has placed a moratorium on filing motions that are not expressly authorized absent further Order of this Court. Distributors thus request leave to file the attached Motion.

The attached Memorandum articulates Movants' support for the Manufacturer Defendants' Joint Motion to Dismiss Track 1 Plaintiffs' Claims for Damages Pursuant to Rule 41(b), which Manufacturer Defendants have requested leave to file. Dkt. 1073. Permitting Movants to join in Manufacturers' Joint Motion conserves this Court's resources by eliminating the need for duplicative motions concerning the issues raised in the Joint Motion.

Movants therefore respectfully request that this Court grant Distributors' leave to file the attached Motion.

Dated: November 6, 2018

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Ashley W. Hardin, hereby certify that the foregoing document and supporting papers were served via the Court's ECF system to all counsel of record.

/s/ Ashley W. Hardin  
Ashley W. Hardin